

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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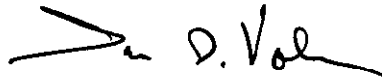
POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

RESPONSES OF PITNEY BOWES WITNESS HALDI TO INTERROGATORIES
OF UNITED STATES POSTAL SERVICE (USPS/PB-T2-1,2)

Pitney Bowes hereby provides responses to the above listed interrogatories of the United States Postal Service filed June 6, 2000. Each question is stated verbatim and is followed by the response.

Respectfully submitted,



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Counsel for Pitney Bowes

June 21, 2000

Response of Pitney Bowes Witness John Haldi to Interrogatory of
U. S. Postal Service

USPS/PB-T2-1. Please confirm that the \$417,930,000 shown on line 14 of Table A-2 is the non-variable window service costs for the PRC version of the Base Year 1998 attributable cost. Tr. 21/9262. If you do not confirm, please indicate how the \$417,930,000 is derived.

Response:

Confirmed; see response to PB/USPS-T11-26

Response of Pitney Bowes Witness John Haldi to Interrogatory of
U. S. Postal Service

USPS/PB-T2-2. Please refer to your Table A-1, line 22, showing \$20 million for Fiscal Year 1998 credit card fees. Please explain the rationale for using an implied variability of 100%, when the source referred to, PB/USPS-T-11-3 [sic] uses a variability of 59.8%.

Response:

The 100% variability was based on the original response of witness Meehan to PB/USPS-11-3(f), filed March 1, 2000. The footnote in Table A-1 (at lines 45-47) is intended to refer to the response of the Postal Service to PB/USPS-T11-3(d), revised March 13, 2000. The response of witness Meehan to PB/USPS-T11(f), revised March 21, 2000 was inadvertently overlooked. An errata will be filed.

ATTESTATION

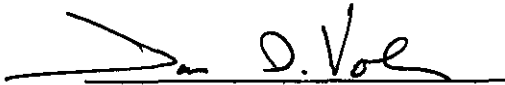
I, John Haldi, declare under penalty of perjury that the foregoing answers to interrogatories were prepared by me or under my supervision and control and that such answers are true and correct, to the best of my knowledge, information and belief.

John Haldi

Dated: June 20, 2000

CERTIFICATION

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with Section 12 of the rules of practice.



Ian D. Volner

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